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CORRES CONTROL  
OUTGOING LTR NO

DE ORDER # 5480 21

96-RF- 00539



KAISER-HILL  
COMPANY

February 15, 1996

96-RF-00539

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ALLER, C. A.			
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ROUCHER, D. W.	X	X	
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CHADE, A. R.	X	X	
FAVER, L. G.	X	X	
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MMER, J. J.	X	X	
immer, G. A.	X	X	
ORRES	X	X	
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TRANSMITTAL OF UNREVIEWED SAFETY QUESTION DETERMINATION (USQD)-RFP-94.1186-BWW  
VM-030-96

Ref (a) USQD-RFP-94.1186-BWW, Department of Energy, Plutonium ES&H  
Vulnerability Assessment, Rocky Flats Site Assessment Report,  
July 29, 1994

(b) Department of Energy, Plutonium ES&H Vulnerability Assessment,  
Rocky Flats Site Assessment Report, July 29, 1994

(c) A. H. Burlingame ltr, AHB-189-95, to M. N. Silverman, USQD of DOE  
Plutonium Environmental, Safety and Health (ES&H) Vulnerability  
Assessment, Rocky Flats Site Assessment Report, July 29, 1994

#### PURPOSE

This correspondence transmits the revised USQD-RFP-94.1186-BWW, Reference (a),  
to the Department of Energy (DOE), Rocky Flats Field Office (RFFO), for review  
and acceptance

#### DISCUSSION

The DOE, RFFO requested that the USQD [Reference (a)], which evaluates the  
Plutonium ES&H Vulnerability Assessment [Reference (b)], be revised to include  
the various programs that help ameliorate the vulnerabilities. The programs  
include the maintenance program, solution stabilization program, and tasks in  
the Site Integrated Stabilization Management Plan associated with abating  
conditions of plutonium metal and oxides. The discussion about these programs  
is presented in the section concerning compensatory measures, USQD  
question #13. The scope, analysis, and conclusions of the USQD are not  
changed from that previously transmitted in Reference (c)

Reference (a) evaluates the six General Vulnerabilities identified in  
Reference (b). Of these six General Vulnerabilities, only the third  
vulnerability is evaluated to represent a new Unreviewed Safety Question  
(USQ). General Vulnerability #3 states 'Degradation of vital safety systems  
(VSSs) concurrent with the loss of experienced plutonium handlers lengthens  
both the "hands-on" duration of an activity and the calendar time to complete  
the activity. Both conditions increase the radiation exposure of the material

ADMIN RECORD

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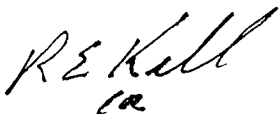
handlers and their support personnel ' Although additional investigation resulted in the conclusion that this General Vulnerability in and of itself does not represent a USQ, it did lead to the identification of plant conditions that represent a USQ. As presented in USQD-RFP-94.1186-BWW, these conditions are 1) increase repair time, and 2) general loss of functionality, both leading to an increased use of compensatory measures for VSSs. These conditions lead to the conclusion that the assumption, regarding accidents concurrent with a failure of a VSS being incredible in the Final Safety Analysis Reports (FSARs), can no longer be substantiated. As presented in USQD-RFP-94 1186-BWW, the conditions associated with this vulnerability require no compensatory measures because the increased risk is not significant.

By separate correspondence, Kaiser-Hill will provide an updated status of the system operability conditions and issues addressed in the USQD. Although some of the systems identified in this USQD have been declared operable since first transmitted to the DOE, the update is not expected to change the conclusions of this USQD.

#### RESPONSE REQUIREMENTS

With these changes, the DOE is asked to accept this USQ and the associated increased risk.

If you have any questions or comments, please contact N G Cathey at extension 5435/pager 3057, or B W White at extension 8261/pager 5278.



Vik Mani, Vice President  
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Kaiser Hill Company, L L C

BWW 1a

Orig and 1 cc - D A Brockman

Attachment  
As Stated

cc  
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